REMARKS

In response to the Office Action mailed on October 10, 2006, Applicants respectfully requests reconsideration. Claims 1-5, 7-19, 21-29, 31-41, 43-47, 49-53, 55-57, 59-60 and 63-66 are now pending in this Application. Claims1, 19, 25, 41, 47 and 53 are independent claims and the remaining claims are dependent claims. In this Amendment, claims 1, 19, 25, 41, 47 and 53 have been amended and claims 61-63 have been cancelled and claims 64-66 have been added. A version of the claims containing markings to show the changes made is included hereinabove. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Rejections under 35 U.S.C. §112

The Examiner rejected claims 61-63 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description. In the prior response, Applicant asserted that support for these claims could be found in the specification as filed (originally) at page 22, lines 5-17. A copy of that section is provided below:

> The packet communications sessions 180 and 182 provide a secure and reliable communications channels that require user authentication and authorization prior to allowing data communications to take place between a computer system 150 and a data storage system 160. Since the communications sessions 180 and 182 represent packet-based connections that operate, for example, according to the commonly used Internet Protocol, data storage system management applications can operate either in the computer systems 150 or on the service processors 170 within the data storage systems 160 and can communicate with each other in a standard manner, such by using TCP/IP. This avoids the problem which is present in conventional service processor communications techniques that require intimate knowledge of complex proprietary communications protocols and technologies to access service processor functionality within conventional data storage systems that are not equipped with embodiments of the invention.

Clearly there is support for IP communications, and as is well known by one of reasonable skill in the art, communication over a packet network such as IP comprises digital communications. Accordingly, Applicants assert that claims 61-63, specifically

the term "IP digital communications session", are supported by the specification and that the rejection under §112, first paragraph should be removed.

Rejections under 35 U.S.C. §102

Claims 1-5, 7-19, 21-29, 31-41, 43-47, 49-53, 55-57 and 59-63 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,023,507 to Wookey (hereinafter Wookey). Applicants respectfully disagrees with these contentions and assert that the present claimed invention is not anticipated by any disclosure in the Wookey reference. Claims 61-63 have been cancelled. Claims 1, 19, 25, 41, 47 and 53 have been amended to include the limitations of claim 61.

Wookey discloses an automatic remote computer monitoring system. In Wookey, as shown in Figure 3 and described at column 4, line 46 through column 5, line 50, discloses a database system which includes a firewall, in which diagnostic information from the monitored system is transmitted back to the service system and stored.

The Examiner stated that Wookey discloses the limitations of claim 1. Applicants respectfully disagree with the Examiner's statement. Claim 1 includes the steps of obtaining connection information for a data communications device, initiating a first packet communications session using the connection information, providing to the data communications device the first packet communications session authentication information such that the data communications device can determine if a user of the computer system is authorized to establish the first packet communications session and allowing the computer system to establish a second packet communications session from the data communications device to the data storage system when the user is authorized or denying the ability to establish a second packet communications session from the data communications device to the data storage system when the user is not authorized. Stated more simply, claim 1 recites establishing a communications session between a first device (the computer system) and a second device (the data communications device) if the user is authorized, and if the user is authorized then establishing a second communications session between the second device (the data

communications device) and a third device (the data storage system). Communications then takes place between the first device and the third device through the first communications session and the second communications session.

In contrast to claim 1, Wookey discloses establishing a communications session between a first device (the service center computer system) and a second device (the modem of the monitored system) if the user is authorized, and then establishing a second communications session between the second device (the modem of the monitored system) and first device (the service center computer system).

Therefore, since Wookey discloses establishing a communications session between a first device and a second device (and does not mention the third device) if the user is authorized, and then establishing a second communications session between the second device and first device (again not a third device), while claim 1 recites establishing a communications session between a first device and a second device if the user is authorized, and if the user is authorized then establishing a second communications session between the second device and a third device, and allowing communications between the first device and the third device by way of the first communications session and the second communications session, claim 1 is believed allowable over Wookey. If the Examiner is to maintain this rejection he is asked to point out in Wookey the existence of a first device, a second device and a third device and the establishing of a first communications session between the first device and the second device and the establishing of a second communications session between the second device and the third device such that the first device communicates with the third device by way of the first communications session and the second communications session. Further, since Wookey established a second communications session between the first device and the second device, Applicants deduct that the first communications session has been terminated (or else the same first communications session would be used instead of establishing a second communications session between the same two devices). Accordingly, Wookey cannot disclose the first device communicates with the third device by way of the first communications session and the

second communications session since the first communications session of Wookey has been terminated prior to the establishing of the second communications session.

Claims 19, 25, 41, 47, 53 and 56 include similar language as claim 1 regarding establishing a communications session between a first device and a second device if the user is authorized, and if the user is authorized then establishing a second communications session between the second device and a third and are believed allowable over Wookey for the same reasons. Claims 2-5, 7-18, 21-24, 26-40, 43-46, 49-52, 55 and 57 depend from claims 1, 19, 25, 41, 47, 53 or 56 and are believed allowable as they depend from a base claim which is believed allowable. Therefore, the rejection of claims 1-5, 7-19, 21-29, 31-41, 43-47, 49-53, 55-57 and 59-60 under 35 U.S.C. §102(b) as being anticipated by Wookey is believed to have been overcome.

Claims 64-66 have been added. Support for these claims can be found in the specification as originally filed at page 2, lines 18-21. Applicants submit that no new matter has been added by the addition of claims 61-63. The prior art of record fails to disclose or suggest the subject matter of these newly added claims.
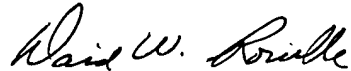
In view of the above, the Examiners objections and rejections are believed to have been overcome, placing claims 1-5, 7-19, 21-29, 31-41, 43-47, 49-53, 55-57, 59-60 and 64-66 in condition for allowance and reconsideration and allowance thereof is respectfully requested.

Applicants hereby petitions for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

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